

USDS SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: <u>6/30/15</u>

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

DEAN SKELOS, and
ADAM SKELOS,

Defendants.

15 Mag. 1492 / 15 cr. 317 (KMW)

PROTECTIVE ORDER ON CONSENT

On the motion of the United States of America, by the United States Attorney for the Southern District of New York, Preet Bharara, by Assistant United States Attorneys Jason A. Masimore, Rahul Mukhi, and Tatiana Martins; and with the consent of the defendant, DEAN SKELOS, by and through his counsel, G. Robert Gage, Esq. and the consent of the defendant, ADAM SKELOS, by and through his counsel, Christopher Conniff, Esq.; and for good cause shown,

IT IS HEREBY ORDERED THAT:

1. Discovery material produced by the Government in this action that contains account numbers, social security numbers, dates of birth, addresses, telephone numbers, information related to legal representation, and information related to medical issues, including records potentially protected by the Health Insurance Portability and Accountability Act and is not

otherwise publicly available, is considered to be "Restricted Information."

2. Restricted Information disclosed to the defendants or to their counsel during the course of proceedings in this action:

(a) Shall be used by the defendants or their counsel only for purposes of this action;

(b) Shall not be distributed or disclosed in any form by the defendants or their counsel except as set forth in paragraph 2(c) below;

(c) May be disclosed by the defendants or their counsel only to the following persons (hereinafter "Designated Persons"):

(i) investigative, secretarial, clerical, paralegal and student personnel employed full-time or part-time by the defendant's attorneys;

(ii) independent expert witnesses, investigators or advisors retained by the defendant or on his behalf in connection with this action;

(iii) fact witnesses or other third-parties interviewed or consulted by the defendant's counsel or a member of the defense team in the course of investigating the case;

(iv) such other persons as hereafter may be authorized by the Court upon such motion by the defendant; and

(d) Shall be returned to the Government following the conclusion of this case together with any and all copies of thereof, or shall be destroyed together with any and all copies thereof, which destruction the defendants' counsel shall verify in writing.

3. The defendants or their counsel shall provide a copy of this Order to any Designated Persons to whom Restricted Information is disclosed pursuant to paragraphs 2(c). Designated Persons shall be subject to the terms of this Order.

4. The provisions of this Order shall not be construed as preventing the disclosure of any information in any motion, hearing, trial, or sentencing proceeding held in this action or to any judge or magistrate of this Court for purposes of this action.

Dated: New York, New York
6 30, 2015

SO ORDERED:

Kimberly M. Wood
UNITED STATES DISTRICT JUDGE

AGREED AND CONSENTED TO:

PREET BHARARA
United States Attorney for the
Southern District of New York
Attorney for Plaintiff

By: Rahul Mukhi
Jason A. Masimore
Rahul Mukhi
Tatiana Martins
Assistant United States Attorneys

5-7-15
Date

DEAN SKELOS
By: G. Robert Gage
G. Robert Gage, Esq.
Attorney for Dean Skelos

5-6-15
Date

ADAM SKELOS
By: Christopher Conniff
Christopher Conniff, Esq.
Attorney for Adam Skelos

5/7/15
Date